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MR. MATTHEW D. ROWE

March 5, 2014

SENT VIA ELECTRONIC MAIL

Federal Communications Commission
445 12th Street, SW
Washington, DC 20024

RE: Expression of Interest – Rural Broadband Trials
Connect America Fund, WC Docket No. 10-90

Project area: Charles City County, Virginia

Dear Chairman Wheeler, Commissioners, and Mr. Chambers:

Charles City County respectfully submits these comments in support of the interest of the Federal Communications Commission in using remaining funds from the Connect America Fund (CAF) program to conduct trials in rural areas that are unserved or underserved, and to allow non-traditional organizations to receive such funds.

Charles City County is located in a rural portion of southeastern Virginia. We have very limited landline data service and wide areas of the county have no cellular service. The economic vitality of our community is threatened by the lack of affordable, high performance broadband. The lack of such directly impacts our ability to attract new businesses, retain existing businesses, and to create jobs.

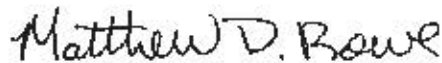
We are currently developing plans to make investments in high performance fiber and wireless infrastructure that would be operated on an open access basis with private sector service providers using that infrastructure to sell directly to their own customers. In this way any community investments in infrastructure would NOT compete with existing local private sector providers and the new infrastructure would be offered to incumbent providers as well as competitive providers (e.g. CLECs) on exactly the same pricing terms. Our effort would be what the Commission considers to be a non-traditional organization.

In contemplating whether to conduct trials providing CAF funds to non-traditional organizations in rural areas, the Commission should consider that in areas like Charles City County, it has an ideal opportunity to do so. We have strong and unified support from our residents and businesses and our elected officials, and proven demand for broadband from our market research. We will also consider becoming qualified as an Eligible Telecommunications Carrier (ETC) if the Commission determines that is a criterion for eligibility to participate in such a trial.

We strongly urge the Commission to move ahead with the rural trials it is considering conducting with CAF funds. Such trials are both feasible and needed. We would note in closing that while the incumbent carriers have been promising us better services and higher performance Internet access for over a decade, those promises have never materialized.

Should you have any questions regarding this letter and/or would like additional information, please feel free to contact me at (804) 652-4707 or via email at mrowe@co.charles-city.va.us. Thank you for your consideration.

Respectfully,



Matthew D. Rowe
Director of Planning / Economic Development
Charles City County, Virginia

Cc: Zach Trogdon, County Administrator